# Exhibit E

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

: PROMESA : Title III
: Case No. 17-BK-3283 (LTS)
: (Jointly Administered)
: :
: : PROMESA : Title III
:
: Case No. 17-BK-04780 (LTS)
Relates Only to PREPA
· : x

# NOTICE OF DEPOSITION OF KEVIN LAVIN BY CORTLAND CAPITAL MARKET SERVICES LLC, AS ADMINISTRATIVE AGENT, AND SOLUS

The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Case:17-03283-LTS Doc#:7242-5 Filed:06/05/19 Entered:06/05/19 22:35:05 Desc: Exhibit E Page 3 of 5

TO: Kevin Lavin, c/o O'Melveny & Myers LLP, Attention Nancy A. Mitchell, 7 Times Square, New York, NY 10036.

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, made applicable by Rule 9014 of the Federal Rules of Bankruptcy Procedure and section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act, Cortland Capital Market Services LLC, as administrative Agent for lenders under that certain Credit Agreement, dated as of May 4, 2012 among PREPA, Scotiabank de Puerto Rico, and the lenders party thereto, and SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra BN LLC, as lenders to PREPA under a certain Trade Finance Facility Agreement, dated as of July 20, 2012, among PREPA and Citibank, N.A., will take the deposition upon oral examination of Kevin Lavin in connection with the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1235].

The deposition will take place on June 14, 2019, at 10:00 A.M., at the offices of Wachtell, Lipton, Rosen & Katz, 51 W. 52nd Street, New York, NY 10019, or at such other time and place as may be agreed upon by counsel. The deposition will take place before a court reporter and will be recorded by stenographic means, may be videotaped, and shall continue from day to day until it has been completed.

Dated: June 3, 2019

#### /s/ Nayuan Zouairabani

Nayuan Zouairabani USDC-PR No. 226411 MCCONNELL VALDÉS LLC 270 Muñoz Rivera Avenue, Suite 7 Hato Rey, Puerto Rico 00918 P.O. Box 364225

San Juan, Puerto Rico 00936-4225

Telephone: (787) 250-5604 Facsimile: (787) 759-9225 Email: nzt@mcvpr.com

#### /s/ Emil A. Kleinhaus

Richard G. Mason (admitted *pro hac vice*) Amy R. Wolf (admitted *pro hac vice*) Emil A. Kleinhaus (admitted *pro hac vice*) Angela K. Herring (admitted *pro hac vice*) Joseph C. Celentino (admitted *pro hac vice*) WACHTELL, LIPTON, ROSEN & KATZ 51 West 52nd Street

New York, New York 10019 Telephone: (212) 403-1000 Facsimile: (212) 403-2000

Email: rgmason@wlrk.com arwolf@wlrk.com eakleinhaus@wlrk.com akherring@wlrk.com jccelentino@wlrk.com

Attorneys for Cortland Capital Market Services LLC, as Administrative Agent

#### /s/ Jose Ramirez-Coll

Jose L. Ramirez-Coll USDC-PR No. 221702 jramirez@amrclaw.com ANTONETTI, MONTALVO & RAMIREZ-COLL P.O. Box 13128 San Juan, Puerto Rico 00907

Telephone: (787) 977-0312 Facsimile: (787) 977-0323 Email: jramirez@amrclaw.com

## /s/ Nicholas Baker

Sandy Qusba (admitted *pro hac vice*)
Bryce L. Friedman (admitted *pro hac vice*)
Nicholas Baker (admitted *pro hac vice*)
SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue

New York, New York 10017 Telephone: (212) 455-2000 Facsimile: (212) 455-2502 Email: squsba@stblaw.com bfriedman@stblaw.com nbaker@stblaw.com

Attorneys for SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra BN LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2019, a true and correct copy of the *Notice of* Deposition of Kevin Lavin by Cortland Capital Market Services LLC, as Administrative Agent, and Solus was served on the following: abyowitz@kramerlevin.com; acaton@kramerlevin.com; akherring@wlrk.com; alexbongartz@paulhastings.com; Andrew.boccio@stblaw.com; andrewtenzer@paulhastings.com; apavel@omm.com; arwolf@wlrk.com; bclark@proskauer.com; bfriedman@stblaw.com; Bill.Natbony@cwt.com; Brian.Liegel@weil.com; cabruens@debevoise.com; devlawoffices@gmail.com; dperez@cabprlaw.com; eakleinhaus@wlrk.com; ebarak@proskauer.com; edward.linden@stblaw.com; ellen.halstead@cwt.com; emckeen@omm.com; eworenklein@debevoise.com; gmashberg@proskauer.com; gregory.silbert@weil.com; jamesbliss@paulhastings.com; jamesworthington@paulhastings.com; Jamie.fell@stblaw.com; jarrastia@gjb-law.com; jccelentino@wlrk.com; jeremy.auster@weil.com; Jeremy.Cain@weil.com; jessica@bufete-emmanuelli.com; jljones@proskauer.com; jonathan.polkes@weil.com; jrapisardi@omm.com; jsuarez@gjb-law.com; ivankirk@tcmrslaw.com; Lara.Ting@weil.com; lauren.haiken@weil.com; lbarefoot@cgsh.com; lcda.wentorres@gmail.com; lft@tcmrslaw.com; lstafford@proskauer.com; lucdespins@paulhastings.com; marcia.goldstein@weil.com; mbienenstock@proskauer.com; mcto@debevoise.com; mdale@proskauer.com; mfb@tcmrslaw.com; michaelcomerford@paulhastings.com; mschierberl@cgsh.com; nbaker@stblaw.com; nhamerman@kramerlevin.com; nicholasbassett@paulhastings.com; nperez@tcmrslaw.com; pfriedman@omm.com; ppossinger@proskauer.com; Reed.Collins@weil.com; remmanuelli@me.com; rgmason@wlrk.com; robert.berezin@weil.com; squsba@stblaw.com; tmayer@kramerlevin.com.

Dated: June 3, 2019

## /s/ Joseph C. Celentino

Richard G. Mason (admitted *pro hac vice*) Amy R. Wolf (admitted *pro hac vice*) Emil A. Kleinhaus (admitted *pro hac vice*) Angela K. Herring (admitted *pro hac vice*) Joseph C. Celentino (admitted *pro hac vice*) WACHTELL, LIPTON, ROSEN & KATZ 51 West 52nd Street New York, New York 10019

Attorneys for Cortland Capital Market Services LLC, as Administrative Agent